



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET, Rm. 3-177
NEW YORK, NY 10007

ALAN H. SCHEINER
Special Federal Litigation Division
phone: (212) 356-3455
fax: (212) 356-0399
email: ascheine@law.nyc.gov

August 12, 2022

Via ECF

Hon. P. Kevin Castel
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

Re: *John Doe v. City of New York, et al.*, 22-CV-2690 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the "City"). I write to respectfully request that the Court accept Under Seal the unredacted Answer filed today provisionally under seal (ECF No. 17), August 12, 2022, pursuant to the Confidentiality Stipulation and Order (ECF No. 11) (the "Order") ¶¶ 2(B),(C), which calls for the provisional filing under seal of matters deemed Confidential under the Order. *See* Order, ¶ 15. A redacted copy of the Answer was also filed. *See* ECF No. 18.

The unredacted Complaint was filed under seal (ECF No. 4) pursuant to this Court's Sealing Order of April 1, 2022 (ECF No. 3). Therefore under the Order, ¶¶ 2(B),(C), the Answer, to the extent it is redacted, is required to likewise be filed under seal, in order to maintain confidentiality of the information alleged in the complaint that was filed under seal and or related responsive information.

We thank the Court for its consideration in this matter.

Respectfully submitted,
Alan H. Scheiner /s/
Alan H. Scheiner
Senior Counsel

cc (via ECF): All Counsel